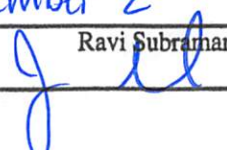


Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

November 2 2022  
Ravi Subramanian, Clerk  
By  Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,  
Plaintiff

v.

JOSEPH ANTHONY TURREY,  
Defendant.

NO. CR21-5385 BHS

**SECOND SUPERSEDING  
INDICTMENT**

The Grand Jury charges that:

**COUNT 1**  
**(Aggravated Sexual Abuse of a Minor – MV1)**

On an unknown date on or between January 25, 2013, and January 24, 2015, on the Lower Elwha Klallam Reservation, in Clallam County, Washington, in Indian Country as defined by Title 18, United States Code, Section 1151, and within the Western District of Washington, JOSEPH ANTHONY TURREY, an Indian, knowingly engaged in, and attempted to engage in, a sexual act, that is, the intentional touching, not through the clothing, of the genitalia of MV1, a minor female who had not attained the age of twelve years at the time of the sexual act, with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

1 All in violation of Title 18, United States Code, Sections 1153, 2241(c), and  
2 2246(2)(D).

3 **COUNT 2**

4 **(Aggravated Sexual Abuse of a Minor – MV2)**

5 On an unknown date on or between August 23, 2008, and August 23, 2010, on the  
6 Lower Elwha Klallam Reservation, in Clallam County, Washington, in Indian Country as  
7 defined by Title 18, United States Code, Section 1151, and within the Western District of  
8 Washington, JOSEPH ANTHONY TURREY, an Indian, knowingly engaged in, and  
9 attempted to engage in, a sexual act, that is, the penetration by a finger, however slight, of  
10 the genital opening of MV2, a minor female who had not attained the age of twelve years  
11 at the time of the sexual act, with an intent to abuse, humiliate, harass, degrade, and  
12 arouse and gratify the sexual desire of any person.

13 All in violation of Title 18, United States Code, Sections 1153, 2241(c), and  
14 2246(2)(C).

15 **COUNT 3**

16 **(Aggravated Sexual Abuse of a Minor – MV2)**

17 On an unknown date on or between August 23, 2008, and August 23, 2010, on the  
18 Lower Elwha Klallam Reservation, in Clallam County, Washington, in Indian Country as  
19 defined by Title 18, United States Code, Section 1151, and within the Western District of  
20 Washington, JOSEPH ANTHONY TURREY, an Indian, knowingly engaged in, and  
21 attempted to engage in, a sexual act, that is, the intentional touching, not through the  
22 clothing, of the genitalia of MV2, a minor female who had not attained the age of twelve  
23 years at the time of the sexual act, with an intent to abuse, humiliate, harass, degrade, and  
24 arouse and gratify the sexual desire of any person.

25 All in violation of Title 18, United States Code, Sections 1153, 2241(c), and  
26 2246(2)(D).

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**COUNT 4**

**(Aggravated Sexual Abuse of a Minor – MV2)**

On an unknown date on or between April 1, 2012, and May 30, 2012, on tribal trust land of the Chehalis Tribe, in Thurston County, Washington, in Indian Country as defined by Title 18, United States Code, Section 1151, and within the Western District of Washington, JOSEPH ANTHONY TURREY, an Indian, knowingly engaged in, and attempted to engage in, a sexual act, that is, contact between the penis and vulva, with MV2, a minor female who had not attained the age of twelve years at the time of the sexual act.

All in violation of Title 18, United States Code, Sections 1153, 2241(c), and 2246(2)(A).

**COUNT 5**

**(Aggravated Sexual Abuse of a Minor – MV2)**

On an unknown date on or between April 1, 2012, and May 30, 2012, on tribal trust land of the Chehalis Tribe, in Thurston County, Washington, in Indian Country as defined by Title 18, United States Code, Section 1151, and within the Western District of Washington, JOSEPH ANTHONY TURREY, an Indian, knowingly engaged in, and attempted to engage in, a sexual act, that is, contact between the penis and the mouth, with MV2, a minor female who had not attained the age of twelve years at the time of the sexual act.

All in violation of Title 18, United States Code, Sections 1153, 2241(c), and 2246(2)(B).

**COUNT 6**

**(Aggravated Sexual Abuse of a Minor – MV2)**

On an unknown date on or between May 1, 2012, and August 22, 2014, on the Lower Elwha Klallam Reservation, in Clallam County, Washington, in Indian Country as defined by Title 18, United States Code, Section 1151, and within the Western District of Washington, JOSEPH ANTHONY TURREY, an Indian, knowingly engaged in, and attempted to engage in, a sexual act, that is, contact between the penis and vulva, with

1 MV2, a minor female who had not attained the age of twelve years at the time of the  
2 sexual act.

3 All in violation of Title 18, United States Code, Sections 1153, 2241(c), and  
4 2246(2)(A).

5 **COUNT 7**

6 **(Abusive Sexual Contact – MV2)**

7 On an unknown date on or between August 23, 2010, and August 22, 2014, on the  
8 Lower Elwha Klallam Reservation, in Clallam County, Washington, in Indian Country as  
9 defined by Title 18, United States Code, Section 1151, and within the Western District of  
10 Washington, JOSEPH ANTHONY TURREY, an Indian, knowingly engaged in, and  
11 attempted to engage in, sexual contact, that is, he intentionally caused the touching of his  
12 penis by MV2, a minor female who had not attained the age of twelve years at the time of  
13 the sexual contact, with an intent to abuse, humiliate, harass, degrade, and arouse or  
14 gratify the sexual desire of any person.

15 All in violation of Title 18, United States Code, Sections 1153, 2244(a)(5), and  
16 2246(3).

17 **COUNT 8**

18 **(Sexual Abuse of a Minor – MV2)**

19 On an unknown date on or between August 1, 2015, and August 31, 2016, on the  
20 Lower Elwha Klallam Reservation, in Clallam County, Washington, in Indian Country as  
21 defined by Title 18, United States Code, Section 1151, and within the Western District of  
22 Washington, JOSEPH ANTHONY TURREY, an Indian, knowingly engaged in, and  
23 attempted to engage in, a sexual act, that is, contact between the penis and vulva, with  
24 MV2, a minor female who had attained the age of twelve years, but who had not yet  
25 attained the age of sixteen years, and who was at least four years younger than JOSEPH  
26 ANTHONY TURREY at the time of the sexual act.

27 All in violation of Title 18, United States Code, Sections 1153, 2243(a), and  
28 2246(2)(A).

**COUNT 9****(Sexual Abuse of a Minor – MV2)**

On an unknown date on or between August 1, 2015, and August 31, 2016, on the Lower Elwha Klallam Reservation, in Clallam County, Washington, in Indian Country as defined by Title 18, United States Code, Section 1151, and within the Western District of Washington, JOSEPH ANTHONY TURREY, an Indian, knowingly engaged in, and attempted to engage in, a sexual act, that is, contact between the mouth and the penis, with MV2, a minor female who had attained the age of twelve years, but who had not yet attained the age of sixteen years, and who was at least four years younger than JOSEPH ANTHONY TURREY at the time of the sexual act.

All in violation of Title 18, United States Code, Sections 1153, 2243(a), and 2246(2)(B).

**FORFEITURE ALLEGATION**

All of the allegations contained in this indictment are realleged and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of any of the offenses alleged in Counts 1 – 9, the Defendant JOSEPH ANTHONY TURREY shall forfeit to the United States, pursuant to Title 18, United States Code, 2253(a)(2) & (3), any proceeds he obtained from the offense, as well as any property that facilitated his commission of the offense.

**Substitute Assets.** If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be subdivided without difficulty;

1 it is the intent of the United States to seek the forfeiture of any other property of the  
2 defendant, up to the value of the above-described forfeitable property, pursuant to Title  
3 21, United States Code, Section 853(p).

4  
5 A TRUE BILL: 11/2/22

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7 DATED:

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9 *Signature of Foreperson redacted pursuant*  
10 *to the policy of the Judicial Conference of*  
11 *the United States.*

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16 FOREPERSON

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NICHOLAS W. BROWN  
United States Attorney

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TODD GREENBERG  
Assistant United States Attorney

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KRISTINE FOERSTER  
Assistant United States Attorney